

9/8-7/21



COMMISSIONERS
Lea Márquez Peterson - Chairwoman
Sandra D. Kennedy
Justin Olson
Anna Tovar
Jim O'Connor


Matthew J. Neubert
Executive Director

Mark Dinell
Securities Division Director

ARIZONA CORPORATION COMMISSION

MEMORANDUM

TO: Lea Márquez Peterson - Chairwoman
Sandra D. Kennedy
Justin Olson
Anna Tovar
Jim O'Connor

FROM: Mark Dinell
Securities Division Director 

DATE: August 16, 2021

RE: Proposed Order to Cease and Desist, Order for Restitution, Order for Administrative Penalties, and Consent to Same; by respondents NVSG702, LLC, NVSG702 LLC, Silverstate702, LLC, and John R. Uranga
Docket No. S-21096A-20-0047

CC: Matthew J. Neubert, Executive Director

Attached for your consideration is a proposed Order to Cease and Desist, Order for Restitution, Order for Administrative Penalties, and Consent to Same ("Consent Order") by respondents NVSG702, LLC, NVSG702 LLC, Silverstate702, LLC, and John R. Uranga. The respondents admit the findings of fact and conclusions of law contained in the proposed Consent Order.

The proposed Consent Order finds that John R. Uranga and three entities he controlled violated A.R.S. §§ 44-1841 and 44-1842 by selling unregistered investments in 151 transactions for a total of \$459,699.19.

The proposed Consent Order also finds that Uranga and his entities violated the anti-fraud provisions of A.R.S. § 44-1991 when selling these investments. These violations include failing to pay investors any principal or interest; failing to disclose to later investors that no previous investors had been paid; purporting to use investor funds to operate a sports betting fund, then using funds primarily for personal expenses; purporting to have made significant profits and to have bought many assets (such as cars, buildings, and businesses) from gambling

revenues, when in fact respondents' only significant income was investor funds; and purporting to be in compliance with Nevada gaming law regarding sports betting funds but failing to meet the requirements of that law.

The proposed Consent Order requires the respondents to pay restitution in the amount of \$459,699.19 and pay a \$100,000 administrative penalty.

The Securities Division recommends the Consent Order as appropriate, in the public interest, and necessary for the protection of investors.

Originator: Ryan J. Millicam

1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

2 **COMMISSIONERS**

3 LEA MÁRQUEZ PETERSON - Chairwoman
4 SANDRA D. KENNEDY
5 JUSTIN OLSON
6 ANNA TOVAR
7 JIM O'CONNOR

In the matter of)	
NVSG702, LLC, a Nevada limited liability)	DOCKET NO. S-21096A-20-0047
company,)	
NVSG702 LLC, a Nevada limited liability)	DECISION NO. _____
company,)	
SILVERSTATE702, LLC, an unincorporated)	ORDER TO CEASE AND DESIST, ORDER
entity, and)	FOR RESTITUTION, ORDER FOR
JOHN R. URANGA, an unmarried individual,)	ADMINISTRATIVE PENALTIES, AND
)	CONSENT TO SAME
Respondents.)	BY: ALL RESPONDENTS
)	

15 Respondents NVSG702, LLC, NVSG702 LLC, Silverstate702, LLC and John R. Uranga
16 (collectively, "Respondents") elect to permanently waive any right to a hearing and appeal under
17 Articles 11 and 12 of the Securities Act of Arizona, A.R.S. § 44-1801 *et seq.* ("Securities Act") with
18 respect to this Order to Cease and Desist, Order for Restitution, Order for Administrative Penalties,
19 and Consent to Same ("Order"). Respondents admit the jurisdiction of the Arizona Corporation
20 Commission ("Commission"); admit the Findings of Fact and Conclusions of Law contained in this
21 Order; and consent to the entry of this Order by the Commission.

22 **I.**

23 **FINDINGS OF FACT**

24 1. John R. Uranga is an unmarried individual who from 2016 through 2020 resided
25 primarily in Arizona.

2. NVSG702, LLC, is a Nevada entity. It filed articles of organization in Nevada on August 26, 2016. It did not list any members or officers in its articles. Nevada revoked this entity's registration less than five weeks later, on September 30, 2016, because the entity failed to file its annual report.

3. About a year later, on September 20, 2017, NVSG702 LLC—i.e. the same entity name but without a comma—filed articles of organization in Nevada. It did not list any members or officers in its articles. Nevada revoked this entity's registration about six weeks after it filed articles, on October 31, 2017, because the entity failed to file its annual report.

4. Both NVSG702 entities will be collectively referred to as "NVSG702."

5. No entity containing the name "NVSG702" has ever been formed or registered to do business in Arizona.

6. There is no entity formed in Nevada, Arizona, in any other state containing the name "SilverState702."

7. Uranga also occasionally operated under the DBAs "Silver State Consulting," "Grand Canyon Consulting" and "Nevada Sports Gambling Consulting." On April 4, 2019, Uranga formed SILVERSTATECONSULTING LLC as an Arizona limited liability company with himself as the only listed member and his Phoenix residential address as the entity's location. This constitutes the only relevant registration for any of these DBAs.

8. From January 2017 through 2019, Respondents offered and sold investments in the form of membership interests in a sports-betting fund in at least 151 transactions for a total of \$459,699.19 within and from Arizona. Investors paid for their investments via wire transfer, check, cash, PayPal, Venmo, and other consideration.

9. Respondents offered and sold these investments to several Arizona residents as well as to non-Arizona residents. The sales to non-Arizona investors occurred when Respondent Uranga was located within Arizona. Uranga made all offers and sales of the investments in both his individual capacity and on behalf of the entity Respondents as he was entity Respondents' sole employee and agent.

1 10. Investors learned of the investment opportunity through Respondents' online
2 solicitations, website, social media posts, and from friends or acquaintances who had invested.

3 11. In exchange for their investment, investors received membership interests in the
4 Respondent entities that entitled them to receive dividends. Several investors received a one-page
5 investor agreement for the designated company, i.e. NVSG702 or SilverState702. The agreement
6 states that the investor is eligible to receive dividends. (As discussed more below, Respondents failed
7 to pay dividends or make any other payments to investors.)

8 12. Respondents described the enterprise to investors and offerees and on social media
9 and their website as a "hedge fund": "Created in 2016 as a start up for Nevada Group wagering aka
10 entity wagering/ hedge fund wagering John Uranga birthed NVSG702/Silverstate702 with the
11 intention of creating a business platform that was similar to the stock market but had hire [sic]
12 dividend payouts."

13 13. Respondents also told potential investors that: "Entity wagering works similarly to
14 traditional funds. First email support@nvsg702.com Request the company operating agreement fill
15 it out send it back along with state issued ID/License and or passport. Once approved you become a
16 member, and transfer funds to NVSG702/Silverstate702."

17 14. Respondents represented that they would pool investor funds and use the pooled funds
18 to gamble on sports events. After paying taxes and subtracting a fee, Respondents would divide
19 profits between the investors and themselves, paying the investors a dividend. As stated on
20 Respondents' website: "Silverstate investors operate on a month to month basis with dividends
21 paying out after month 3 of the company and every month as requested by investor." Thus, as profits
22 increased or decreased, the fortunes of Respondents and the investors would rise or fall together.

23 15. Investors were not involved in operating the business. The Respondent entities had a
24 sole employee, Uranga, who would make all the investment decisions and operate the business.
25 Respondents told several investors and offerees and posted on Respondents' website that Uranga had
26

1 inside information on several sports teams that did not show up in the teams' injury reports or other
2 public sources.

3 16. Respondents also represented that "We use highly skilled algorithms that we have
4 built over the years. We take as much guess work out of the mix as possible. We are the top rated
5 gambling firm in America!" The use of the plural "we" is misleading as Uranga is the only employee.
6 Additionally, there is no evidence that Respondents developed or used any sort of algorithm in the
7 few sports-related bets that Uranga placed (described more below) or that any ranking system has
8 named Respondents at all, much less as a top-rated gambling firm.

9 17. Respondents posted pictures on social media representing that they had significant
10 winnings. An October 16, 2018 Instagram post from Uranga is captioned "Killing them with package
11 sales! Thank you alllll [*sic*] for giving me a great life, i [*sic*] hope I'm returning the favor and we all
12 continue to win a lot of \$\$\$\$...." The captioned photo is a PayPal summary chart for an unidentified
13 account that appears to show \$208,062 of deposits from February through October, presumably in
14 2018, the year of the post. However, Nevada gaming records show that Uranga—as an individual,
15 not through an entity as he represented—only placed \$6,560 of legitimate sports bets in 2018 and
16 incurred a net loss of \$2,460 from this activity. Additionally, as discussed more below, during this
17 period Respondents had been banned from online sports gambling and paid no dividends to any
18 investors.

19 18. Other social media posts showed Uranga having large amounts of cash and driving a
20 Ferrari.

21 19. In another social media post, Uranga claimed to own five cars, three houses in three
22 different states, two apartment complexes and several businesses, including two auto body shops, a
23 hotel, a car dealership, six cell phone stores, a pawn shop, a multi-media company, a property
24 management company, and one gun store.

25 20. On October 23, 2018, Uranga bragged in an Instagram post about buying a \$6 million
26 property saying, "Sometimes you just gotta purchase a hotel on a Monday...6 milly milly milly" and

1 posted a picture of the purported sales agreement. The sales agreement is undated and has the names
2 of both the buyer and the seller and most of the property's address redacted with a red marker. The
3 redaction, however, fails to cover the last letter of the buyer's name—the letter “g”, which is followed
4 by “LLC”—showing that the buyer is neither Uranga nor any of the entity Respondents.

5 21. In fact, for most of 2017 – 2018, the primary source of deposits in Respondents' bank
6 accounts was the investor funds described in this Notice. These deposits ranged from as little as \$50
7 to more than \$10,000.

8 22. Several of Respondents' social media posts solicited investing in the pooled gambling
9 fund. One post stated a minimum investment of \$2,000 was required, that investors receive 70% of
10 the total winnings (after taxes), Respondents receive 30%, that every investor receives an ownership
11 packet, and that the investor can fund the investment via wire transfer or bank deposit. Some of these
12 posts said that the hedge fund had a limited number of spots each quarter, that the quarter's spots
13 were almost filled or closed, and that investments could be made for the next quarter. In one of these
14 posts, Respondents offered a 10% bonus for referring someone to the company.

15 23. Respondents posted photos of a “Limited Liability Company Charter” for NVSG702,
16 LLC issued by the Nevada Secretary of State stating that the entity's Articles of Organization were
17 on file with the Nevada Secretary of State as of August 26, 2016. One of these posts, posted on
18 Instagram on July 26, 2018, by Uranga, was captioned “credentials.” Another Instagram post had a
19 picture of the charter and the caption “Registered with the BBB and...incorporated in the state of
20 NEVADA!! There isn't another business in the industry with my creditalis [*sic*]!!!! #Sportsbetting
21 #sportsbook #freeplay #sportsbets #betting #sports #gambling....” Respondents' posts failed,
22 however, to disclose that NVSG702, LLC had its registration revoked five weeks after the date listed
23 in the charter.

24 24. Several investors and offerees viewed Respondents' social media posts prior to
25 investing; they relied on Respondents' representations in those posts when deciding to invest.
26

1 25. Respondents further represented on their website that they are "Legal and Regulated."
2 They explain this as follows: "NVSG702/Silverstate is not registered with the Securities and
3 Exchange Commission, nor does it have to be for SB443...The newly passed Senate Bill 443 allows
4 Nevada entities to place sports wagers with funds from their investors."

5 26. Respondents' representations that they comply with SB443 and that compliance
6 affects securities regulation are both false. Passed in 2015, SB443 allowed sports pools to accept
7 wagers from an entity if several criteria are met. These criteria include having the entity establish a
8 wagering account with the sports pool, providing the sports pool with valid photo identification for
9 each person entitled to payments from the profits or revenue of the entity showing that the person is
10 at least 21 years old and social security numbers for persons entitled to payments, and providing the
11 entity's formation documents and all filings with the Nevada Secretary of State. The Nevada law
12 does not exempt entities from federal or state securities regulation regarding raising and use of
13 investor funds and fraud in connection with raising funds. Respondents failed to disclose this fact to
14 investors and offerees. Further, Respondents have never complied with SB443. Respondents did not
15 have an account with a sports pool. Respondent Uranga, as an individual, briefly had access to one
16 sports pool, CG Technologies. The entities were never allowed to use CGT: only Uranga, in his
17 individual capacity, placed a limited number of investments on CGT (where he incurred net losses).
18 However, as discussed more below, in November 2017, CGT barred Uranga and the entity
19 Respondents from gambling with CGT due to false representations and apparent illegal conduct.
20 Another requirement of SB443 is that the entity provide the sports pool with all of the entity's
21 documents and filings with the Nevada Secretary of State. Had Respondents done this, they would
22 have had to disclose that they never filed an annual report or officers list for the NVSG702 entities,
23 which resulted in the revocation of the entity's registration; SilverState702 was never formed.
24 Finally, Respondents did not receive photo ID or social security numbers from several investors and
25 at least one of the investors was under 21. Because of this, it was impossible for Respondents to
26

1 comply with SB443. Thus, Respondents' representations of being in compliance with federal
2 securities laws and Nevada law are false.

3 27. Respondents told investors and offerees that their investments would be used for
4 placing bets on sports events.

5 28. In fact, during 2017 and 2018, Respondents used the majority of investor funds for
6 cash withdrawals and purchases consistent with personal expenses.

7 29. In 2017 and 2018, Respondent Uranga used only approximately \$43,000 for
8 potentially legitimate sports gambling. He incurred a net loss from gambling with this money.

9 30. Respondents represented to offerees and investors that Respondents were working
10 with CG Technologies, an online gambling platform, to facilitate sports bets and that this platform
11 was the only legal online, sports-betting platform in the U.S. In fact, only Uranga as an individual
12 used the CGT platform: the Respondent entities were never approved to do any wagering on CGT.
13 On November 7, 2017, CGT sent Respondents a demand letter stating that Respondents had been
14 misappropriating CGT's name and making misrepresentations to investors that Respondents were
15 working with CGT to facilitate what appeared to be illegal activity. The letter stated Respondents
16 well knew that they had no business relationship with CGT. CGT required that Respondents cease
17 and desist from making any representations that they have any business relationship with CGT. CGT
18 closed Uranga's private account and banned Respondents from placing wagers with CGT.

19 31. Respondents posted several posts on social media that described payouts about to
20 come to investors. Respondents have not, however, made any payments to investors.

21 32. On several occasions, investors demanded a return of their money. In these instances,
22 Respondents would string along the investors—sometimes for more than a year—repeatedly
23 promising them that payments would be coming soon or that checks had already been sent. In some
24 instances, Uranga told investors that they needed to contact Respondents' accounting department
25 about their payments. He told one person that he has a separate company that handles accounting. He
26 later told this person that he has two separate companies that handle check payouts and accounting

1 and that the investor should contact the support line. When the investor called the “support line”
2 number that Uranga gave her, no one answered. His representations about an accounting department
3 contradict what he told this investor on an earlier occasion when he said that he is the
4 “accounting/online media team,” meaning that she should talk with him about getting her dividends
5 and payments. He told another person that he (Uranga) had issued several payments to several
6 investors, had mailed checks, and would issue checks and payments to the investor soon. The
7 investors, however, did not receive any checks or any payments of any kind from Respondents.
8 Additionally, Respondents’ representations about having an accounting department are false. In fact,
9 Respondents have no other employees and Uranga does not own and is not affiliated with any
10 accounting companies.

11 33. Respondents failed to inform later investors and offerees that Respondents made no
12 payments to previous investors.

13 II.

14 CONCLUSIONS OF LAW

15 1. The Commission has jurisdiction over this matter pursuant to Article XV of the
16 Arizona Constitution and the Securities Act.

17 2. Respondents offered or sold securities within or from Arizona, within the meaning of
18 A.R.S. §§ 44-1801(16), 44-1801(22), and 44-1801(27).

19 3. Respondents violated A.R.S. § 44-1841 by offering or selling securities that were
20 neither registered nor exempt from registration.

21 4. Respondents violated A.R.S. § 44-1842 by offering or selling securities while neither
22 registered as a dealer or salesman nor exempt from registration.

23 5. Respondents violated A.R.S. § 44-1991 by (a) employing a device, scheme, or artifice
24 to defraud, (b) making untrue statements or misleading omissions of material facts, and (c) engaging
25 in transactions, practices, or courses of business that operate or would operate as a fraud or deceit.
26

6. Respondents' conduct is grounds for a cease and desist order pursuant to A.R.S. § 44-2032.

7. Respondents' conduct is grounds for an order of restitution pursuant to A.R.S. § 44-2032.

8. Respondents' conduct is grounds for administrative penalties under A.R.S. § 44-2036.

9. Respondent Uranga directly or indirectly controlled NVSG702 and Silverstate702 within the meaning of A.R.S. § 44-1999. Therefore, Uranga is jointly and severally liable under A.R.S. § 44-1999 to the same extent as these entities for their violations of A.R.S. § 44-1991.

III.

ORDER

THEREFORE, on the basis of the Findings of Fact, Conclusions of Law, and Respondents consent to the entry of this Order, attached and incorporated by reference, the Commission finds that the following relief is appropriate, in the public interest, and necessary for the protection of investors:

IT IS ORDERED, pursuant to A.R.S. § 44-2032, that Respondents, and any of Respondents agents, employees, successors and assigns, permanently cease and desist from violating the Securities Act.

IT IS FURTHER ORDERED that Respondents comply with the attached Consent to Entry of Order.

IT IS FURTHER ORDERED, pursuant to A.R.S. § 44-2032 that Respondents pay restitution to the Commission in the principal amount of \$459,699.19 as a result of the conduct set forth in the Findings of Fact and Conclusions of Law. Payment is due in full on the date of this Order. Payment shall be made to the "State of Arizona" to be placed in an interest-bearing account controlled by the Commission. Any principal amount outstanding shall accrue interest at the rate of ten percent per annum from the date of this Order, subject to any legal offsets, pursuant to A.A.C. R14-4-308(C).

IT IS FURTHER ORDERED that the restitution ordered in the preceding paragraph will accrue interest, as of the date of the Order, at the rate of the lesser of (i) ten percent per annum or (ii)

1 at a rate per annum that is equal to one per cent plus the prime rate as published by the board of
2 governors of the federal reserve system in statistical release H. 15 or any publication that may
3 supersede it on the date that the judgment is entered.

4 The Commission shall disburse the funds on a pro-rata basis to investors shown on the records
5 of the Commission. Any restitution funds that the Commission cannot disburse because an investor
6 refuses to accept such payment, or any restitution funds that cannot be disbursed to an investor
7 because the investor is deceased shall be disbursed on a pro-rata basis to the remaining investors
8 shown on the records of the Commission. Any funds that the Commission determines it is unable to
9 or cannot feasibly disburse shall be transferred to the general fund of the state of Arizona.

10 IT IS FURTHER ORDERED, pursuant to A.R.S. § 44-2036 that Respondents shall jointly
11 and severally pay an administrative penalty in the amount of \$100,000 as a result of the conduct set
12 forth in the Findings of Fact and Conclusions of Law. Payment is due in full on the date of this Order.
13 Payment shall be made to the "State of Arizona." Any amount outstanding shall accrue interest as
14 allowed by law.

15 IT IS FURTHER ORDERED that payments received by the state of Arizona shall first be
16 applied to the restitution obligation. Upon payment in full of the restitution obligation, payments
17 shall be applied to the penalty obligation.

18 For purposes of this Order, a bankruptcy filing by Respondents shall be an act of default. If
19 Respondents do not comply with this Order, any outstanding balance may be deemed in default and
20 shall be immediately due and payable.

21 IT IS FURTHER ORDERED, that if Respondents fail to comply with this order, the
22 Commission may bring further legal proceedings against Respondents, including application to the
23 superior court for an order of contempt.

24 IT IS FURTHER ORDERED that this Order shall become effective immediately.
25
26

BY ORDER OF THE ARIZONA CORPORATION COMMISSION

CHAIRWOMAN MÁRQUEZ PETERSON

COMMISSIONER KENNEDY

COMMISSIONER OLSON

COMMISSIONER TOVAR

COMMISSIONER O'CONNOR

IN WITNESS WHEREOF, I, MATTHEW J. NEUBERT,
Executive Director of the Arizona Corporation Commission,
have hereunto set my hand and caused the official seal of the
Commission to be affixed at the Capitol, in the City of Phoenix,
this _____ day of _____, 2021.

MATTHEW J. NEUBERT
EXECUTIVE DIRECTOR

DISSENT

DISSENT

This document is available in alternative formats by contacting Carolyn D. Buck, ADA
Coordinator, voice phone number (602) 542-3931, e-mail cdbuck@azcc.gov.

(RJM)

CONSENT TO ENTRY OF ORDER

1
2 1. Respondents admit the jurisdiction of the Commission over the subject matter of this
3 proceeding. Respondents acknowledge that Respondents have been fully advised of Respondents'
4 right to a hearing to present evidence and call witnesses and Respondents knowingly and voluntarily
5 waive any and all rights to a hearing before the Commission and all other rights otherwise available
6 under Article 11 of the Securities Act and Title 14 of the Arizona Administrative Code. Respondents
7 acknowledge that this Order constitutes a valid final order of the Commission.

8 2. Respondents knowingly and voluntarily waive any right under Article 12 of the
9 Securities Act to judicial review by any court by way of suit, appeal, or extraordinary relief resulting
10 from the entry of this Order.

11 3. Respondents acknowledge and agree that this Order is entered into freely and
12 voluntarily and that no promise was made or coercion used to induce such entry.

13 4. Respondents have been represented by an attorney in this matter, Respondents have
14 reviewed this order with their attorney, **Gil Negrete** of the Negrete Law Firm, and understand all
15 terms it contains. Respondents acknowledge that their attorney has apprised them of their rights
16 regarding any conflicts of interest arising from dual representation. Respondents acknowledge that
17 they have each given their informed consent to such representation.

18 5. Respondents admit the Findings of Fact and Conclusions of Law contained in this
19 Order. Respondents agree that Respondents shall not contest the validity of the Findings of Fact and
20 Conclusions of Law contained in this Order in any present or future proceeding in which the
21 Commission is a party.

22 6. Respondents further agree that they shall not deny or contest the Findings of Fact and
23 Conclusions of Law contained in this Order in any present or future: (a) bankruptcy proceeding, or
24 (b) non-criminal proceeding in which the Commission is a party (collectively, "proceeding(s)").
25 They further agree that in any such proceedings, the Findings of Fact and Conclusions of Law
26 contained in this Order may be taken as true and correct and that this Order shall collaterally estop

1 them from re-litigating with the Commission or any other state agency, in any forum, the accuracy
2 of the Findings of Fact and Conclusions of Law contained in this Order. In the event any Respondent
3 pursues bankruptcy protection in the future, Respondents further agree that in such bankruptcy
4 proceeding, pursuant to 11 U.S.C. § 523(a)(19), the following circumstances exist:

5 A. The obligations incurred as a result of this Order are a result of the conduct set forth
6 in the Findings of Fact and Conclusions of Law in the Order and are for the violation of Arizona
7 state securities laws, pursuant to 11 U.S.C. § 523(a)(19)(A)(i);

8 B. This Order constitutes a judgment, order, consent order, or decree entered in a state
9 proceeding pursuant to 11 U.S.C. § 523(a)(19)(B)(i), a settlement agreement entered into by
10 Respondents pursuant to 11 U.S.C. § 523(a)(19)(B)(ii), and a court order for damages, fine, penalty,
11 citation, restitution payment, disgorgement payment, attorney fee, cost or other payment owed by
12 Respondents pursuant to 11 U.S.C. § 523(a)(19)(B)(iii).

13 7. By consenting to the entry of this Order, Respondents agree not to take any action or
14 to make, or permit to be made, any public statement denying, directly or indirectly, any Finding of
15 Fact or Conclusion of Law in this Order or creating the impression that this Order is without factual
16 basis.

17 8. While this Order settles this administrative matter between Respondents and the
18 Commission, Respondents understand that this Order does not preclude the Commission from
19 instituting other administrative or civil proceedings based on violations that are not addressed by this
20 Order.

21 9. Respondents understand that this Order does not preclude the Commission from
22 referring this matter to any governmental agency for administrative, civil, or criminal proceedings
23 that may be related to the matters addressed by this Order.

24 10. Respondents understand that this Order does not preclude any other agency or officer
25 of the state of Arizona or its subdivisions from instituting administrative, civil, or criminal
26 proceedings that may be related to matters addressed by this Order.

1 11. Respondents agree that they will not apply to the state of Arizona for registration as a
2 securities dealer or salesman or for licensure as an investment adviser or investment adviser
3 representative until such time as all restitution and penalties under this Order are paid in full.

4 12. Respondents agree that they will not exercise any control over any entity that offers
5 or sells securities or provides investment advisory services within or from Arizona until such time as
6 all restitution and penalties under this Order are paid in full.

7 13. Respondents consent to the entry of this Order and agree to be fully bound by its terms
8 and conditions.

9 14. Respondents acknowledge and understand that if they fail to comply with the
10 provisions of the order and this consent, the Commission may bring further legal proceedings against
11 Respondents, including application to the superior court for an order of contempt.

12 15. Respondents understand that default shall render them liable to the Commission for
13 its costs of collection, including reasonable attorneys' fees and interest at the maximum legal rate.

14 16. Respondents agree and understand that if Respondents fail to make any payment as
15 required in the Order, any outstanding balance shall be in default and shall be immediately due and
16 payable without notice or demand. Respondents agree and understand that acceptance of any partial
17 or late payment by the Commission is not a waiver of default by the Commission.

18 17. Uranga represents that he is an officer of NVSG702 and Silverstate702 and has been
19 authorized by name of these entities to enter into this Order for and on their behalf.

20 **[Signature pages follow.]**
21
22
23
24
25
26

JOHN R. URA

X

Respondent John R. Uranga

STATE OF ARIZONA

)

) SS

County of

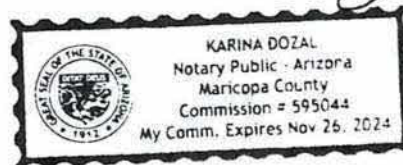
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SUBSCRIBED AND SWORN TO BEFORE me this 07 day of AUGUST, 2021.

NOTARY PUBLIC

My commission expires:

Nov 26, 2024



NVSG702, LLC

X

By: John R. Uranga

Its: Managing Officer

STATE OF ARIZONA

2

) SS

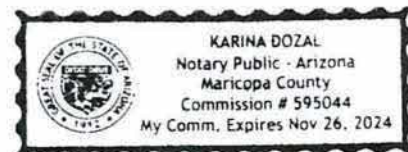
County of Maricopa

SUBSCRIBED AND SWORN TO BEFORE me this 30th day of August, 2021.

NOTARY PUBLIC

My commission expires:

NOV 26, 2024



NVSG702, LLC

x

By: John R. Uranga

Its: Managing Officer

STATE OF ARIZONA)

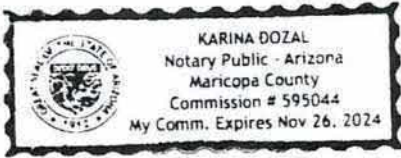
County of Maricopa)^{SS}

SUBSCRIBED AND SWORN TO BEFORE me this 3rd day of August, 2021.

Karina Dozal
NOTARY PUBLIC

My commission expires:

NOV 26, 2024



SILVERSTATE702, LLC

x

By: John R. Uranga

Its: Managing Officer

STATE OF ARIZONA)

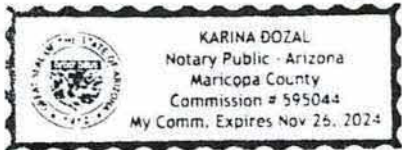
County of Maricopa)^{SS}

SUBSCRIBED AND SWORN TO BEFORE me this 3rd day of August, 2021.

Karina Dozal
NOTARY PUBLIC

My commission expires:

NOV 26, 2024



1 SERVICE LIST FOR: NVSG702, LLC *et al.*
2
3 John R. Uranga, *et al.*
4 c/o Gil Negrete (counsel for respondents for purposes of settlement negotiations)
5 gil@negretelawfirm.com
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1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

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3 COMMISSIONERS

4 LEA MÁRQUEZ PETERSON - Chairwoman
5 SANDRA D. KENNEDY
6 JUSTIN OLSON
7 ANNA TOVAR
8 JIM O'CONNOR

9 In the matter of:

10 NVSG702, LLC, a Nevada limited liability
11 company,

12 NVSG702 LLC, a Nevada limited liability
13 company,

14 SILVERSTATE702, LLC, an unincorporated
15 entity, and

16 JOHN R. URANGA, an unmarried individual,

17 Respondents.

DOCKET NO. S-21096A-20-0047

**CERTIFICATION OF SERVICE OF
PROPOSED OPEN MEETING
AGENDA ITEM**

18 On this 16th day of August 2021, the foregoing document was filed with Docket Control as
19 a Securities Division Memorandum & Proposed Order. On this date or as soon as possible
20 thereafter, a copy of the foregoing will be mailed to the following who have not consented to email
21 service.

22 John Uranga Jr.
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24 Phoenix, Arizona 85023

25 *Respondent and officer of respondents NVSG702, LLC, NVSG702 LLC, and Silverstate702, LLC*

26 By:



Emie R. Bridges, Executive Assistant